

1     **REMPFER MOTT LUNDY, PLLC**  
2     JOSEPH N. MOTT  
3     Nevada Bar No. 12455  
4     SCOTT E. LUNDY  
5     Nevada Bar No. 14235  
6     10091 Park Run Dr., Ste. #200  
7     Las Vegas, NV 89145-8868  
8     T: (702) 825-5303  
9     F: (702) 825-4413  
10    [Joey@rmllegal.com](mailto:Joey@rmllegal.com)  
11    [Scott@rmllegal.com](mailto:Scott@rmllegal.com)

12    With

13    **LAW OFFICES OF STEVEN J. PARSONS**  
14    STEVEN J. PARSONS  
15    Nevada Bar No. 363  
16    10091 Park Run Dr., Ste. #200  
17    Las Vegas, NV 89145-8868  
18    T: (702) 384-9900  
19    F: (702) 384-5900  
20    [Steve@sjplawyer.com](mailto:Steve@sjplawyer.com)

21    Attorneys for Plaintiff  
22    **ERIN WETZEL**

23                                   **UNITED STATES DISTRICT COURT**  
24                                   **DISTRICT OF NEVADA**

25    **ERIN WETZEL**, an individual;

26                                   **Plaintiff,**

27    vs.

28    **MEDICWEST AMBULANCE, INC.**, a Nevada  
29    corporation; and **ENVISION HEALTHCARE**  
30    **CORPORATION**, a Delaware corporation,

31                                   **Defendants.**

**Case No. 2:16-cv-2271-RFB-(PAL)**

**STIPULATION AND ORDER TO EXTEND TIME FOR  
PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION  
FOR SUMMARY JUDGEMENT**

**(FIRST REQUEST)**

1 The parties, by their undersigned counsel of record, hereby stipulate that deadline for  
2 filing Plaintiff's Opposition to Defendants Motion for Summary Judgement (ECF No. 33), currently  
3 due on Friday, June 1, 2018, shall be extended up to and including June 22, 2018. This is the  
4 parties first request to extend this deadline.

5 Plaintiff's counsel requested this extension as a courtesy in light of the recent passing of  
6 attorney Andrew L. Rempfer, who was lead counsel on this matter from the time of filing, and  
7 whose passing has created caseload issues for Plaintiff's counsel. Plaintiff's counsel also  
8 requested this extension in light of their filing of objections to Magistrate Judge Leen's Order  
9 regarding certain depositions that Plaintiff feels are necessary to allow Plaintiff to fully prove her  
10 case. Based on the foregoing, this stipulation is for good cause and is not for purposes of delay.

11 Dated: Thursday, May 31, 2018.

12 REMPFER MOTT LUNDY, PLLC

PAYNE & FEARS, LLP

13 /s/ Joseph N. Mott  
14 Joseph N. Mott  
15 Nevada Bar No. 12455  
16 Attorneys for Plaintiff  
17 **Erin Wetzel**

/s/ Matthew L. Durham  
Matthew L. Durham  
Nevada Bar No. 12060  
Attorney for Defendants  
**Medicwest Ambulance, Inc. and**  
**Envision Healthcare Corporation**

18 **ORDER**

19 **IT IS SO ORDERED.**

20 Dated: 1st day of June, 2018.



21 **RICHARD F. BOULWARE, II**  
22 **United States District Court**